

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JENNIFER L. BENGSTON COOK,

Defendant.

CRIMINAL ACTION NO.
7:24-cr-779-JDA

**MOTION TO SEAL
SENTENCING MEMORANDUM**

Defendant Cook requests the Court allow her to file her sentencing memorandum under seal, pursuant to Local Crim. Rule 49.01 and applicable Fourth Circuit authority.

Counsel makes this request to protect the privacy interests of the individual involved in this case. The privacy interest and safety of the individual involved outweighs the public's interest in access to this material. This Court has inherent authority to seal this document. *Baltimore Sun v. Goetz*, 886 F.2d 60 (4th Cir. 1988); *In re Application of the United States for an Order Pursuant to 18 U.S.C. Section 2703(D)*, 707 F.3d 283 (4th Cir. 2013).

Based on the important interests at stake and the Court's authority in these matters, counsel for the Defendant respectfully requests the Court allow the sentencing memorandum to be filed under seal because it contains private medical and/or psychological information. Because a vast majority of the information to be included in the sentencing memo is directly related to private medical issues, counsel believes this important privacy interest warrants the sealing of this memo.¹

Counsel has discussed this request with the assigned AUSA and he does not object.

Respectfully Submitted,

s/ Joshua Snow Kendrick

¹ To avoid violating privacy interests, counsel can email additional information related to his request directly to the Court if necessary.

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Greenville, South Carolina